



TITLE VI COMPLIANCE PROGRAM

APRIL 2021



Equitable distribution of transit service is a core principle of Green Bay Metro. This document describes the measures taken to promote equitable transit service as stipulated by Title VI of the Civil Rights Act of 1964 and Executive Order 12898 (Environmental Justice).

Table of Contents

Executive Summary	3
Definitions	3
Policy of Nondiscrimination.....	4
Demographic Profile	4
Distribution.....	5
Complaint Procedure	5
Overview.....	5
Submitting Complaints to GBM.....	5
Written Complaints.....	5
Verbal Complaints.....	6
Procedure	6
Appeal.....	6
Documentation of Complaints.....	6
Filing Federal Complaints	7
Subrecipient.....	7
Public Participation	7
Service Standards	8
Fixed Route	8
Paratransit Route.....	9
Microtransit Route.....	10
Performance Standards	10
Routes	10
Evaluation.....	11
Fare and Service Change Equity Analysis.....	11
Conclusion	12
Resources.....	13
Adoption and Revision History	13
 Appendix A	
GBM Demographic Profile Map Statistics	14
Appendix B	
GBM Title VI Complaint Form	18
Appendix C	
GBM Title VI Public Notice.....	20
Appendix D	
GBM LEP Plan.....	21

The Brown County Planning Commission (BCPC), serving as the Metropolitan Planning Organization (MPO) for the Green Bay Urbanized Area, provided data used in the plan. GBM's Title VI Plan can be found at [GBM Title VI](#).

EXECUTIVE SUMMARY

Green Bay Metro (GBM) is committed to provide an equitable mass transit system that fairly distributes the benefits and adverse effects of transit service without regard for race, color, national origin, or low-income status. This principle is detailed and reinforced by Title VI of the Civil Rights Act of 1964 and Executive Order 12898 (Environmental Justice).

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Specifically, Title VI states, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

In 1994, President Clinton issued Executive Order 12898, which states that each federal agency "shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

The Federal Transit Administration's (FTA) Circular 4702.1B provides its recipients of FTA financial assistance with instructions for achieving compliance with Title VI and Environmental Justice. In this circular, the FTA requires that GBM document measures taken to comply with DOT's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. In addition, all subrecipients of GBM are required to submit a Title VI Program ensuring compliance of the Federal Transit Administration (FTA) Circular 4702.1B.

GBM is governed by the Green Bay Transit Commission. The Commission consists of seven individuals that are appointed by the Mayor of Green Bay. One of the seven is a City of Green Bay Council person that serves as a liaison to the City Council.

Membership of GBM Transit Commission and Committees, by self-identified race

Body	Caucasian	Latino	African American	Asian American	Native American
Transit Commission	57.1%	14.3%	14.3%	0%	14.3%
Disability Appeals Committee	100%	0%	0%	0%	0%

DEFINITIONS

Color: Skin color or complexion

Discrimination: Refers to any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or origin.

Disparate Treatment: Refers to actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e. less favorably) than others because of race, color, or national origin.

Limited English Proficient (LEP): Refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

National Origin: Refers to the particular nation in which a person was born, or where the person's parents or ancestors were born.

Race (as defined by the U.S. Census): A social classification of people which includes, at a minimum, White, Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific Islander. Based on the demographics for your area, other races may be included.

POLICY OF NONDISCRIMINATION

GBM assures that no person shall, on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987, (P.L. 100.259), be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity provided by GBM.

Title VI compliance is a condition of receipt of federal funds. Patricia Kiewiz, GBM Transit Director, serves as the Title VI Coordinator and is authorized to ensure compliance with this policy and the law, including the requirements of the Code of Federal Regulation (CFR).

Demographic Profile

GBM serves 59.11 square miles of the Green Bay Urbanized area, with a population of 176,595.

Total Population of GBM Service Area	Total Brown County Population	Brown County Minority Population	Brown County Percent Minority
176,595	264,821	48,727	18.4

Based on the American Community Survey, all of Brown County has a minority population of 18.4%. This would include areas such as Suamico, which has a minority population less than that of the county as a whole. Green Bay alone would have a minority population greater than that of the county as a whole.

GBM transit service is primarily utilized by minority and low-income populations. In September 2021, the 2020 census data will be available.

For detailed information pertaining to the GBM's minority and low-income populations, demographic maps are included in Appendix A to this document.

Distribution

Public Dissemination provisions of Title VI information require recipients of Federal financial assistance to publish or broadcast program information in the media. Advertisements must state that the program is an equal opportunity program and/or indicate that federal law prohibits discrimination. Additionally, reasonable steps shall be taken to publish information in languages understood by the population eligible to be served or likely to be directly affected by services.

Title VI public notices are posted on all fixed route buses, paratransit vehicles, public lobbies, and website. To obtain a copy of the Title VI Compliance Program, please contact GBM.

COMPLAINT PROCEDURE

Overview

Federal recipients are required to directly accept, log and investigate complaints of discrimination. Further, recipients are required to notify the public of their right to complain and the procedures for processing their complaint. These procedures cover all complaints filed under Title VI relating to any program or activity administered by GBM, its sub-recipients, consultants, and contractors.

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel.

Any person who believes they have been mistreated by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with GBM. Any such complaint must be filed in writing or in person with GBM, 901 University Avenue, Green Bay, WI, 54302. Any individual, group, or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements may file a complaint. A formal complaint must be filed within 180 days of the alleged occurrence.

GBM has had no investigations or lawsuits pertaining to Title VI.

Submitting Complaints

Written and verbal complaints will be accepted by GBM.

Written Complaints

The preferred method is to file your complaint in writing using the Title VI Complaint Form (Appendix B), and sending it to:

Patricia Kiewiz, Transit Director
GBM Title VI Coordinator
901 University Avenue
Green Bay, WI 54302
(920) 448-3450

The complainant is advised to file a signed, written complaint up to thirty (30) days from the date of the alleged discrimination. The complaint should include the following information:

- Complainant name, mailing address, phone number and information on how to best contact you (i.e., telephone number, e-mail address, etc.).

- How, when, where, and why you believe you were discriminated against. Include the location, names, and contact information of any witnesses.
- Other information that you deem significant.

Verbal Complaints

Verbal complaints will be accepted and transcribed by the Title VI Coordinator. To make a verbal complaint, call (920) 448-3450 and ask for the Title VI Coordinator.

Procedure

Upon receiving the complaint, GBM will determine its jurisdiction, acceptability, need for additional information, and investigative merit of the complaint. In some situations, GBM may request that the City of Green Bay Human Resources Department or an independent outside agency conduct the investigation.

Once GBM decides its course of action, the complainant will be notified in writing of such determination within five calendar days.

In cases where GBM assumes investigation of the complaint, GBM will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten days upon receipt, to furnish GBM with his/her response to the allegations.

Within 60 days of receipt of the complaint, the Title VI Coordinator will prepare a written investigative report. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

The recommendations shall be reviewed by the city of Green Bay attorney. The City Attorney may discuss the report and recommendations with the Title VI Coordinator. The report will be modified as needed and made final for its release to the parties.

Once the investigative report becomes final, briefings will be scheduled within 15 days. Both the complainant and the respondent shall receive a copy of the investigative report during the briefings and will be notified of their respective appeal rights.

Appeal

If the complainant or respondent is not satisfied with the results of the investigation of the alleged discriminatory practice(s), they shall be advised of their rights to appeal GBM's decision to the Federal Transit Administration Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave. SE, Washington DC 20590.

Documentation of Complaints

A record of complaints will be maintained by GBM and contain the following information for each complaint filed:

- The name and contact information of the person filing the complaint
- The date of the complaint
- The basis of the complaint
- The disposition of the complaint

Filing Federal Complaints:

Complaints can be filed externally with the U.S. Department of Transportation and/or the FTA at:

Federal Transit Administration Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor-TCR
1200 New Jersey Ave. SE
Washington DC 20590

SUBRECIPIENT

GBM's subrecipients of federal financial assistance must also comply with the Title VI of the Civil Rights Act of 1964 which prohibits discrimination on the basis of race, color or national origin, as effectuated by U.S. DOT regulation 49 C.F.R. Part 21. To meet its enforcement responsibilities GBM has implemented a subrecipients monitoring process.

- Each year subrecipients must provide GBM with an FTA Certifications and Assurances, signed and initialed that all records and other information required under FTA Circular 4702.1B have been or will be compiled, as appropriate, and maintained.
- Each year GBM requests a record of any Title VI complaints filed with subrecipients and the documentation certifying investigation and resolution into said claims.
- Once every three years subrecipients must provide GBM with an updated Title VI plan in order for GBM to ensure compliance with FTA Title VI regulations and to meet the requirements of FTA Circular 4702.1B.
- Subrecipients are required to display the public notice card for Title VI Plan in all Section 5310/85.22 funded vehicles.
- Subrecipients must take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).
- Subrecipients agree to comply with and participate in Compliance Site Reviews conducted by GBM or authorized contractor.

PUBLIC PARTICIPATION

The Public Participation Plan is a guide to GBM's ongoing public participation endeavors. Its purpose is to ensure that GBM utilizes effective means of providing information and receiving public input on transportation decisions from the general public, including low income, minority and limited English proficient (LEP) populations.

Under federal regulations, transit operators must take reasonable steps to ensure the Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means the public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English. GBM's Public Participation Policy can be found [Green Bay Metro Public Participation Policy](#)

Fixed Route Service: Proposals that include a fixed route service reduction of 10% or more in terms of annual system service hours and/or significant changes to the system as a whole shall warrant public involvement. An increase in fixed route service or minor modifications to existing service does not constitute a significant change.

Paratransit Service: Proposals that include paratransit service hour reductions of 10% or more in terms of annual hours of operation and /or issues relating to level of service and/or certification shall warrant public involvement. In addition, should paratransit service boundaries be proposed to be reduced, GBM staff will provide written notification to all certified paratransit clients who reside in the proposed reduction area.

SERVICE STANDARDS

FTA Circular 4702.1b Chapter VI requires fixed-route service providers of Urbanized Areas with a population of 200,000 or more to establish service standards and monitor their service to ensure service is provided accordingly. Service standards guide fixed-route service providers toward objective decision-making in the provision of service. The FTA further expects transit agencies to monitor their service to ensure service is provided in a non-discriminatory manner.

Green Bay Metro provides public transportation services (fixed route, paratransit, and on demand) to the City of Green Bay urbanized area, which includes: Villages of Allouez, Ashwaubenon, and Bellevue, and Cities of De Pere and Green Bay.

The following service standards and policies are meant to ensure that transit services and amenities are distributed fairly throughout the system. Service standards are regularly monitored and reviewed by GBM staff to ensure non-discrimination in the distribution of transit services and amenities and to ensure service is planned and operated in an equitable manner. Green Bay Metro (GBM) has set the service standards and policies below:

Fixed Route

Vehicle Loading Standards: Average ratio of passengers per seat per bus during a service hour at the maximum load point. GBM operates different vehicle types containing different numbers of seats and standing room capacity.

- GBM matches vehicle type with ridership levels and will use larger buses on higher ridership routes.
- GBM provides more frequent service on routes that exceed capacity limits.

Vehicle Headway: Maximum scheduled time interval between buses.

- GBM strives to maintain headways of fixed route bus service within the range of every 30 minutes during the peak period and 60 minutes during non-peak period.

Schedule Adherence: Percent adherence to scheduled service.

- GBM provides an average of system-wide on-time performance of 90% for fixed route service.

- GBM defines on-time as arriving at designated bus stops from zero to five minutes after the scheduled time. Route(s) and trips not meeting the on-time performance goal will be analyzed for strategies to improve it.

Bus Scheduling: Process by which transit vehicles are placed into revenue service throughout the transit system. All buses are low-floor and equipped with air-conditioning, ramps, and automated bus stop annunciators.

- GBM rotates buses among all routes to ensure a balance of miles obtained on the vehicles. No specific bus, type or style is assigned to a specific route. High-capacity routes may be assigned 40' buses to assist with demand.

Distribution of Amenities: Transit amenities refer to items of comfort and convenience available to the general riding public.

- Bus Stop Spacing—amount of space between bus stops.
 - Bus stops will be no more than ¼ mile apart. Stops shall generally be at the far side of intersections. In outlying areas, stops shall generally be at the near side of intersections. Bus stops may be placed at other locations if warranted by special circumstances. Accessibility will be another consideration in the location of bus stops, with adherence to ADA accessibility guidelines wherever possible.
- Bus Stop Shelters and Benches—the placement of shelters or benches is general based on the number of boarding passengers at a specific stop. However, needs based placement will also be considered.
 - Passenger shelters shall be provided at major loading points where boarding passenger volumes are greater than 20 persons per day and also hospitals, clinics, higher education, and centers for seniors and individuals with disabilities. The shelters shall be of an attractive design that provides good shelter from the weather and must be of sufficient size so as not to restrict the mobility and comfort of patrons in wheelchairs. Benches will be placed in areas where riders may gather that may not be feasible for a shelter. Placement of shelters and benches will comply with Americans with Disabilities Act (ADA) accessibility guidelines for building and facilities.
- Safe Stop Program—GBM makes every effort to ensure bus stops are accessible.
 - Under this program, riders may request attention to a stop at any given time. Examples would be due to snow, construction area concerns, etc.

Paratransit

The Americans with Disabilities Act (ADA) of 1990 requires public transit agencies to provide paratransit service to persons with disabilities who cannot access the public transit system due to their disability. Paratransit services are provided through contracted agency who agrees to meet GBM's service standards developed in compliance with Title VI of the Civil Rights Act of 1964. Title VI service standards include a minimum of five elements: Vehicle Load, Vehicle Assignment, Vehicle Headway, Distribution of GBM amenities and GBM Access.

It is the policy of GBM to ensure compliance with the Title VI of the Civil Rights Act of 1964, Civil Rights Restorative Act of 1987, Executive Order 12898-Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, Executive Order

13166-Improving Access to Services for Persons with Limited English Proficiency, and related non-discrimination statutes and regulations in all program and services. Paratransit system complements the same area and hours of Green Bay Metro's fixed-route system.

The current Service Area for paratransit services consists of portions of the Cities of Green Bay and De Pere and the Villages of Allouez, Ashwaubenon, and Bellevue. No paratransit services are to be provided in any area which is outside the three-quarter mile service area or within the boundaries of a jurisdiction within which GMB does not have the legal authority under Wisconsin law to operate even if the area is within three-quarters of a mile from an existing Metro fixed bus route. All trips must have both their origin and destination within the Service Area.

Revenue vehicles shall be operated in accordance with all applicable local, State, and Federal laws and regulations with regard to safety, comfort, and convenience of passengers and the general public.

Complaints (written and verbal) shall be reported by project personnel, along with any operational problems to the contractor, who in turn will forward to GBM within 24 hours of their occurrence on an approved complaint form. The logging of complaints shall include a written description of the complaint and any resolution of the complaint by the contractor.

Schedule Adherence:

- Trips will be considered on-time only if the contractor picks up the passenger within the on-time window. The on-time window starts 15 minutes before and ends 15 minutes after the passenger's scheduled pick-up time.
- Contractor is required to complete 95% of all scheduled trips on an on-time basis.
- Passengers shall not spend more than sixty (60) minutes in a vehicle during a trip.

As required by 49 CFR Part 38, wheelchair accessible vehicles must be equipped with either a ramp or lift, wheelchair securement with separate passenger lap and shoulder restraints, front or rear-facing mobility device securement positions, and all other requirements stated in Part 38 pertaining to wheelchair accessible vans or minibuses.

The service must be accessible to ambulatory, semi-ambulatory, and non-ambulatory individuals with disabilities and conform to the accessibility specifications contained in 49 CFR, Part 38, subpart B for ADA and Wisconsin 5.347.48; (2m) (b, c, & d). Paratransit provider can use a mix of vehicles to provide the service to ambulatory elderly and people with disabilities.

Microtransit

Microtransit services are being piloted in 2021 by contracted agency. Policies will be established if service is recommended to be continued by the Transit Commission after that time.

PERFORMANCE STANDARDS

Routes: Each route should be evaluated individually to determine if the service provided is attracting a desired amount of ridership and revenue. Criteria are generally based on national and state standards. In some instances, performance of an individual route is judged in relationship to the performance of the entire system. This considers cost differences, inflation, and conditions specific to the local service area. Otherwise, standards could quickly become outdated. The criteria used to evaluate the operational performance of GBM system are as follows:

- Revenue per Hour
 - Shall be no less than 80 percent of the system median. This data is used to determine the financial success of the route. Criteria mandating that individual routes fall within a specific range of the system median is considered a reasonable measuring device because certain routes may be less financially efficient than others.
- Passengers per Hour
 - By determining the number of passengers per hour, bus routes can be compared to one another as to how many passengers they can carry regardless of a varying fare structure. As with the revenue per hour criterion, the number of passengers per hour should be at least 80 percent of the system median.
- Operating Ratio
 - Determined by dividing a route's passenger revenue by its total operating expense. The operating ratio on any route should not be less than 80 percent of the system median. Operating ratio measures the percent of expenses recovered by fares.
- Loading Standards
 - Allows for adequate capacity to meet passenger demand. The average maximum load factor is determined for service peak and off-peak periods. It is calculated by dividing the number of passengers at the maximum load point of a route by the number of seats provided on the bus. A factor greater than 1.00 signifies that some passengers are standees. The average maximum load factor for local peak service should be 1.25. For local off-peak service and all express service, the average maximum load factor should be 1.00.
- Schedule Adherence
 - The acceptable level of on-time performance for the system is > 90%. This is one of the most important criteria in evaluating route performance. On-time operation ensures a smooth running system by minimizing waiting time for passengers. While the goal of a transit system is to achieve 100 percent on-time operation, many unanticipated factors can cause delays, such as traffic congestion, accidents, rail and bridge crossings, mechanical failures and inclement weather.

Evaluation Period: Examination of routes is to be made annually with new routes evaluated after the first six month and twelve month periods. Any route inconsistent with the revenue and service criteria established for the system should be further examined to determine the reasons for not achieving desired performance. Serious consideration must be given to abandoning or making substantial changes to routes which are chronically unproductive.

- On an annual basis the bus route evaluation will be documented and presented to the Green Bay Transit Commission. Recommendations for bus route changes will be included in the evaluation report.

FARE AND SERVICE CHANGE EQUITY ANALYSIS

Equity Analysis Policies

FTA Circular 4702.1B Chapter IV.7, requires GBM to establish policies that will guide the analysis to determine whether major service changes will have a disproportionately negative impact on minority or low-income populations. Accordingly, GBM established equity analysis policies and a service evaluation process to meet this requirement. GBM must establish a Major Service Change

Policy, a Disparate Impact Policy, and a Disproportionate Burden Policy. Collectively, these policies provide foundational requirements for evaluating service change proposals for equity. These policies and their applicable thresholds are listed below:

- Major Service and Fare Change Policy
 - A major service change is defined as a 25 percent addition or reduction in the service hours of any route that would remain in effect for twelve (12) or more months. All major service changes will be subject to an equity analysis that includes an analysis of adverse effects.
 - Adverse Effect is defined as a geographical or temporal reduction in service that includes, but is not limited to eliminating a route, shortening a route by eliminating segments, rerouting an existing route, and increasing headways. GBM shall consider the degree of adverse effects and analyze those effects when planning major service changes.
 - A fare change is defined as any fare increase or reduction.
- Service Disparate Impact and Disproportionate Burden Policy
 - A major service change should not have a disparate or disproportionate adverse effect on low-income or minority populations.
- Fare Disparate Impact and Disproportionate Burden Policy
 - Per policy, low-income or minority populations should not have a disparate or disproportionate adverse effect.
 - If a proposed major service change or fare change results in a disparate impact or a disproportionate burden, GBM will consider modifying the proposed service change. GBM will then analyze the modification and make sure it removed the potential disparate impact or disproportionate burden. If a less discriminatory option cannot be identified and GBM can demonstrate a substantial legitimate justification for the proposed service change, the FTA may allow GBM to proceed with the proposed change.

CONCLUSION

An equitable public transit system is a fair transit system where services, resources, benefits, and impacts are distributed with respect to transit demand, not race, color, national origin, or income status. Staff seeks to not only comply with these civil rights laws, but to enhance efforts to guarantee fairness in the delivery of GBM's services.

Below are the key initiatives to occur during the 2021 – 2023 reporting period include:

- Preliminary Fare Equity Analysis: Cashless Fare System – an analysis of the equity implications of implementing a cashless fare system.
- Safety and Security Community Relations Plan: Build a trusting relationship with community, informing safety & security policies and practices with community feedback.
- Language Assistance: Engage communities to determine which language assistance tools and practices can best ensure access to our services.

During this reporting period, GBM performed public engagement, completed equity analyses for major fare and service changes. This snapshot summarizes GBM's effort to not only comply with the requirements of FTA Circular 4702.1B, but to advance social equity through policy and public engagement.

RESOURCES

Please see the websites below for more information.

Green Bay Metro Transit

- [Green Bay Metro Title VI](#)
- [Green Bay Metro Title VI Complaint Form](#)
- [Green Bay Metro Public Participation Policy](#)
- [Green Bay Metro Reports & Studies](#)

WisDOT guidance

- [WisDOT Transit Title VI Compliance](#)
- [WisDOT Department Title VI Office](#)

Federal legal authorities

- [FTA Circular 4702.1B](#) (Title VI)
- [FTA Circular 4703.1](#) (Environmental Justice)
- [49 C.F.R. 21](#)
- [Executive Order 13166](#) (LEP)
- [Executive Order 12898](#) (Environmental Justice)

Federal guidance

- [US DOT LEP guidance](#)
- [FTA resource page](#)
- [FHWA resource page](#)

Training Links

- [FTA Title VI training page](#)
- [FTA Title VI training video](#)
- [FHWA Title VI PowerPoint presentations](#)

Other helpful resources

- [US Census Bureau](#)

ADOPTION AND REVISION HISTORY

Approved by Green Bay Transit Commission February 19, 2014

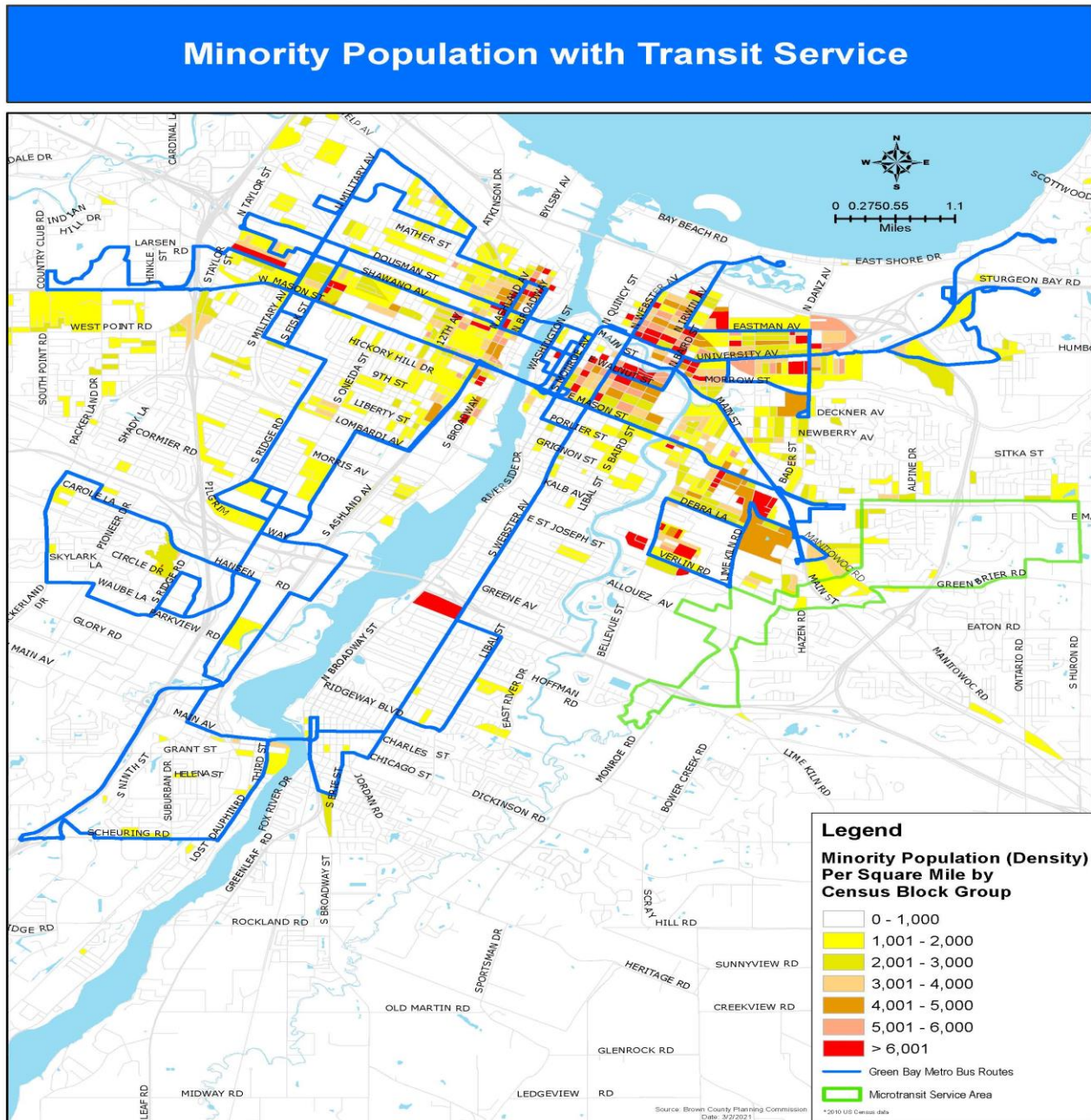
Approved by Green Bay Transit Commission May 20, 2015

Approved by Green Bay Transit Commission February 17, 2016

Approved by Green Bay Transit Commission March 14, 2018

Approved by Green Bay Transit Commission April 21, 2021

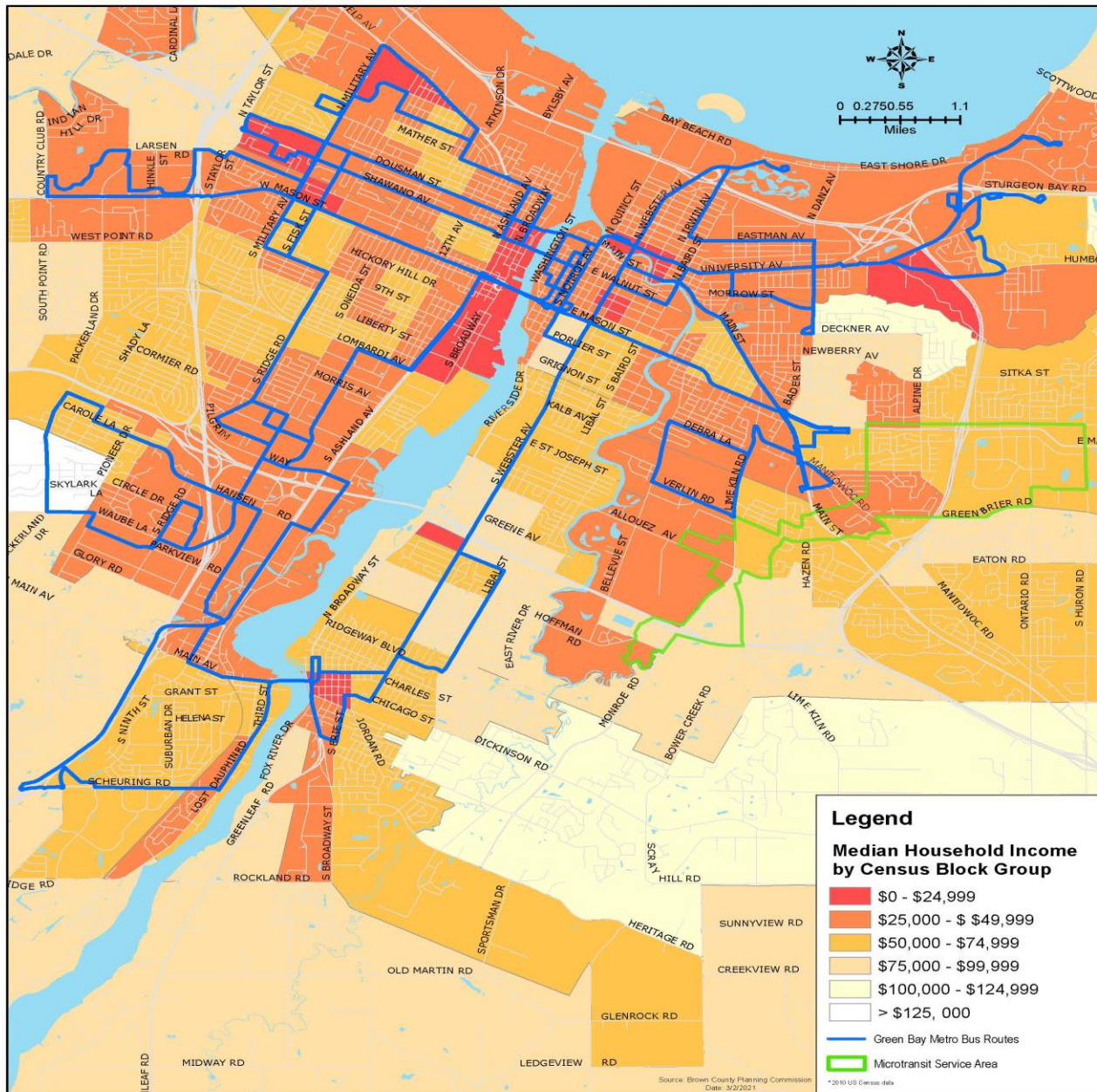
Appendix: A Demographic Profile Map Statistics



US Census Community Survey data

Category - Census blocks (+/-)	<u>Brown County</u>
Self-Identified as non-White/Caucasian	18.4%
Self-Identified as White/Caucasian	81.6%

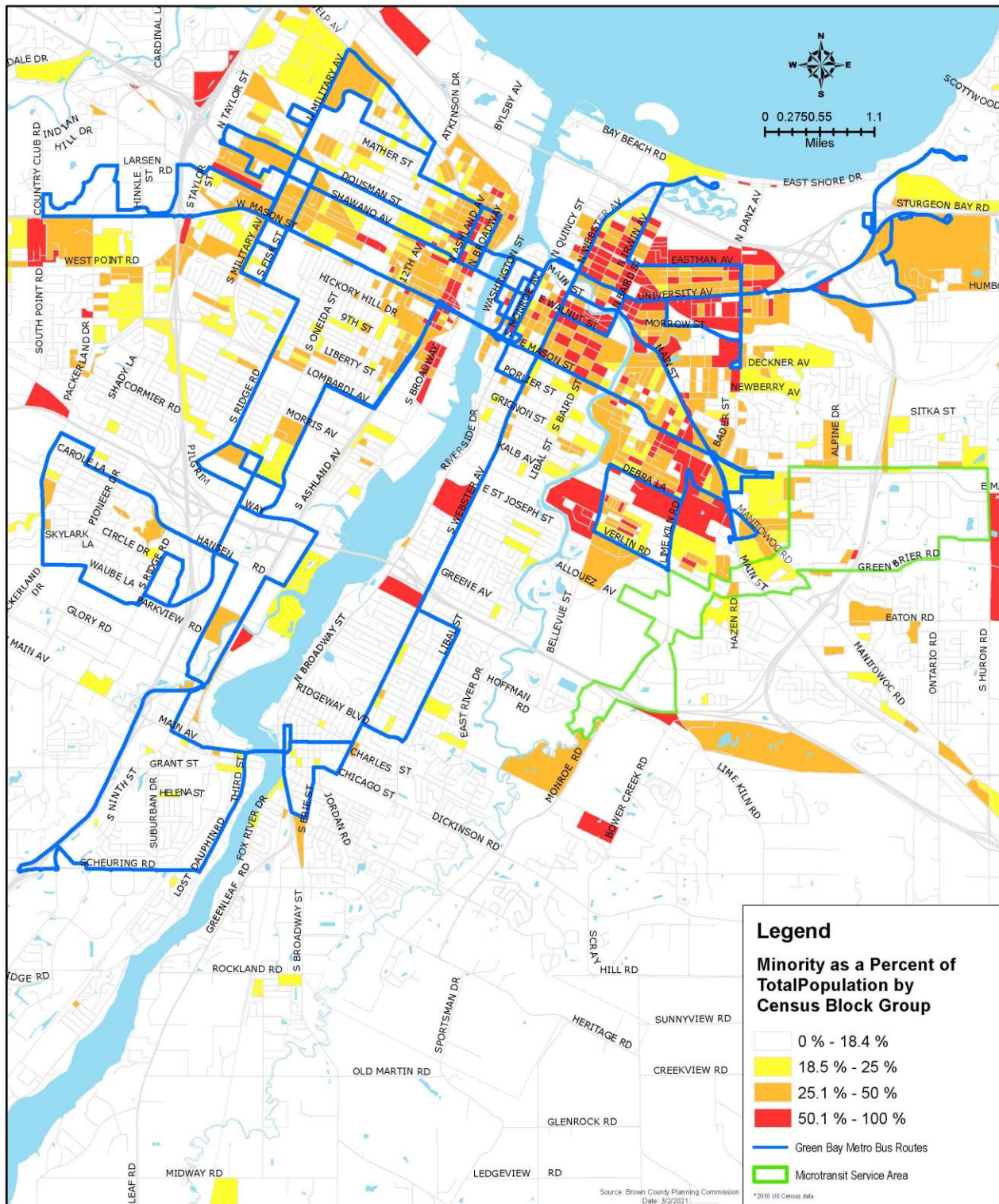
Household Income with Transit Service



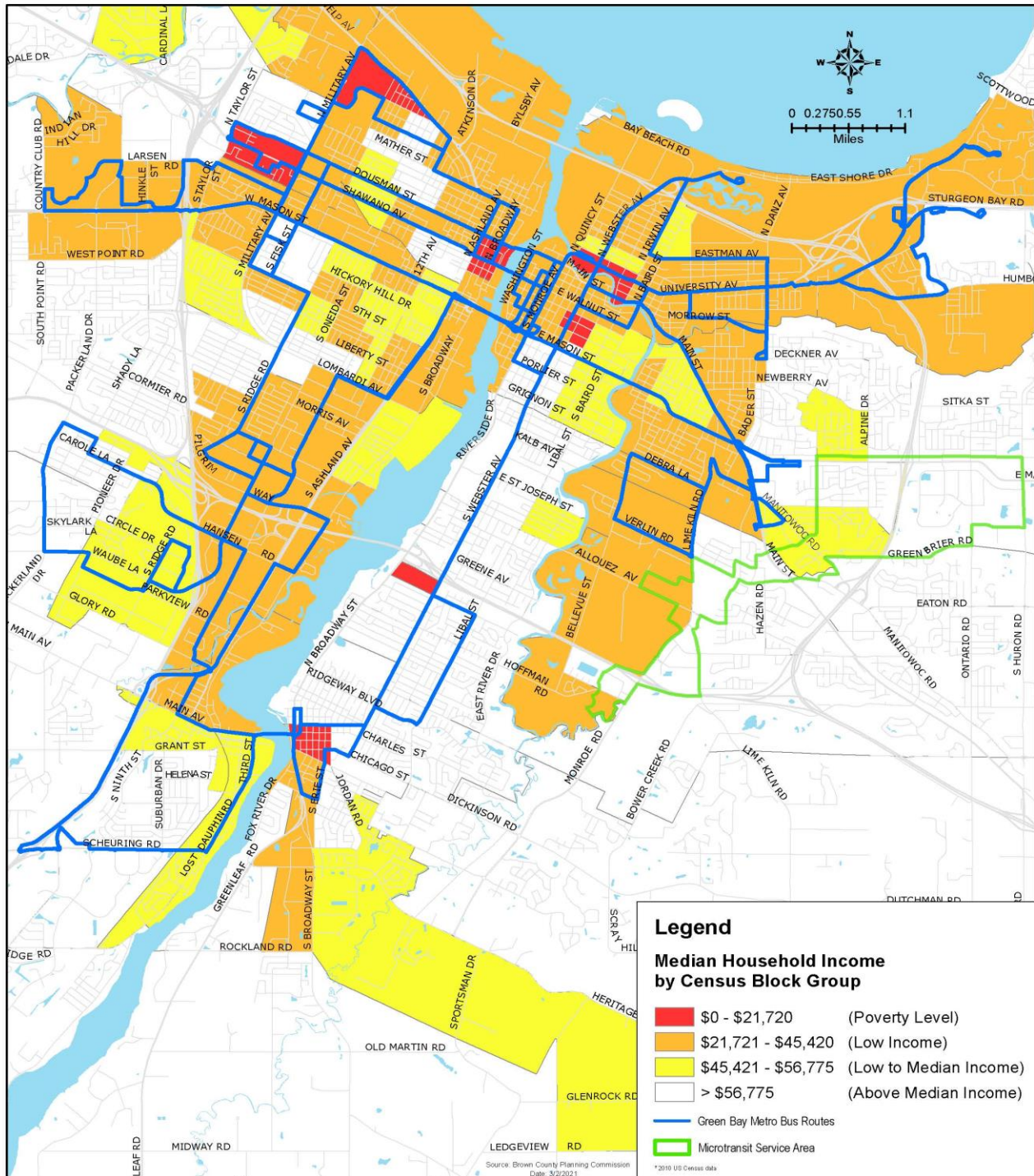
US Department of Health and Human Service US Census data

Category (three-person household)	Household Income
Median Income in Brown County	\$56,775
Low-Income in Brown County (80% of the Median)	\$45,420
Poverty for a three-person Household	\$21,720

Equity Analysis - Minority Population with Transit Service



Equity Analysis - Household Income with Transit Service



Appendix B



Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." Note: The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please let us know.

Complete and return this form to:

Title VI Coordinator
Green Bay Metro
901 University Avenue
Green Bay, WI 54302

1. Complainant's Name _____

2. Address _____

3. City, State and Zip Code _____

4. Telephone Number (home) _____ (business) _____

5. Person discriminated against (if someone other than the complainant)

Name _____

Address _____

City, State and Zip Code _____

6. Which of the following best describes the reason you believe the discrimination took place?

Was it because of your:

a. Race/Color _____

b. National Origin _____

c. Other _____

7. What date did the alleged discrimination take place? _____

8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

9. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? _____ Yes _____ No

If yes, check all that apply:

10. Please provide information about a contact person at the agency/court where the complaint was filed.

11. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

19

Appendix C



Title VI Public Notice

Green Bay Metro (GBM) is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. It is GBM's objective to:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- Promote the full and fair participation of all affected populations in transportation decision-making.
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- Ensure meaningful access to programs and activities by persons with limited English proficiency.

GBM is committed to a policy of non-discrimination in the conduct of its business, including adherence to Title VI responsibilities and the delivery of equitable and accessible transportation services. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color, or national origin may file a Title VI complaint with GBM.

Any such complaint must be in writing and submitted to the GBM Title VI Coordinator within 180 days following the date of the alleged discrimination. A Title VI Civil Rights Complaint Form is available by calling 920-448-3450. Complaints should be addressed to:

**Patricia Kiewiz
Title VI Coordinator
Green Bay Metro
901 University Avenue
Green Bay, WI 54302**

A complainant may also file a complaint directly with the Federal Transit Administration by submitting it to the Office of Civil Rights, Attention: Compliant Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE. Washington, DC 20590.

Please visit www.greenbaymetro.org to view GBM's Title VI Program.

If information is needed in another language, contact 920-448-3450.

Appendix D

Green Bay Metro Limited English Proficiency (LEP) Plan

Policy Statement

GBM is committed to breaking down language barriers by implementing consistent standards of language assistance across its service area.

Census. The United States is home to millions of national origin minority individuals who are LEP. That is, their primary language is not English and they cannot speak, read, write or understand the English language at a level that permits them to interact effectively with recipients of Federal financial assistance. Because of language differences and the inability to effectively speak or understand English, persons with LEP may be subject to exclusion from programs or activities, experience delays or denials of services. These individuals may be entitled to language assistance with respect to a particular type of service. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide. This will require agencies to establish creative solutions to address the needs of this ever-growing population of individuals, for whom English is not their primary language.

2019 American Community Survey (ACS) Estimates for Brown County Limited English Proficiency Summary by Brown County Planning Commission January 2021				
Language Spoken at Home	Population	Percent	Speak English less than "very well" Number	Speak English less than "very well" Percent
Population 5 years and over	248,055	100.0%	11,266	4.5%
English only	221,024	89.1%		
English only or Speak English "very well"	236,789	95.5%		
Language other than English:	27,031	10.9%		
Spanish	17,284	7.0%	8,672	3.5%
Other Indo- European	2,634	1.1%	438	0.2%
Asian and Pacific Islanders	4,958	2.0%	1,766	0.7%
All other languages	2,155	0.9%	390	0.2%
Those under the age of 5 are not included in language data.				
Indo-European includes many, but not all, countries in Europe and the Middle East.				

ANALYSIS OF FACTORS

Factor No. 1: The number or proportion of LEP persons in the service area. The vast majority of the population with which we do business (individuals wishing to ride transit) is proficient in English, so that LEP services are not normally required.

- According to the 2019 American Community Survey, English is spoken by 89.1% of those five and older in Brown County. The majority of those who speak another language also speak English.

- A total of 8,672 or 3.5 percent of the Spanish speaking population in Brown County indicate they speak English less than "very well".
- A total of 1,766 Asian and Pacific Islander speaking individuals indicate they speak English less than "very well". The ACS recognizes approximately 280 Asian and Pacific Islander languages. The most common are Chinese, Japanese, Korean, Hmong, Thai, Laotian, and Vietnamese.
- GBM ensures meaningful access to all programs and activities by persons with Limited English Proficiency. Monitoring of the system is done to ensure all language needs are met. Currently ridership consists of only English and Spanish speaking riders. No other LEP populations meet Safe Harbor thresholds.
- GBM Title VI and LEP policies and complaint procedures are posted at the Transportation Center and on Metro's website. Employees are trained to be aware and assist LEP individuals by directing them to GBM dispatch, which will then connect them to the appropriate persons for language assistance help.

Factor No. 2. The frequency with which LEP individuals come into contact with the service. All contacts with GBM are made through its Metro Center located in Green Bay, WI. LEP persons are serviced daily via our buses and contracted paratransit demand response service. LEP contacts are relatively minimal.

Factor No. 3: The nature and importance of service provided by GBM. GBM provides important transit services throughout the urbanized area to the public through its fixed route, limited service, microtransit and paratransit programs.

Factor No. 4. The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons. GBM has experienced staff that is fluent in Spanish and have agreed to serve as interpreters as needed on those occasions when a person with limited English proficiency contacts the transit system. In an effort to accommodate individuals with language barriers at all times, GBM does utilize translation services from a contracted company when necessary. GBM provides the following documents in English, Spanish and Somali:

- Route Guide
- Title VI Notice
- Title VI Complaint Form
- ADA Paratransit Application
- Reduced Fare Application
- Travel Training Brochure
- Google Translate is available to assist in the interpretation of GBM's website at www.greenbaymetro.org.

IMPLEMENTATION PLAN

GBM's plan is currently implemented and it is reviewed annually, including any contacts with LEP persons to determine the frequency of contacts, the language used, and how the contacts were handled. We identify LEP persons in the service area by ridership, telephone contact counts, neighborhood demographics, general awareness surveys and on-board surveys. GBM's Title VI Policy and a Complaint Form are available at the Metro Center. All printed maps and schedules have Title VI language. When service changes occur, notices are available in Spanish and English language, other languages upon request. Alerts that provide information on changes are posted on the bus, website and all social media outlets. In order to comply with

49 CFR 21.9(d), GBM must provide information to beneficiaries regarding their Title VI obligations and inform beneficiaries of the protections against discrimination afforded them by Title VI.

INCLUSIVE PUBLIC PARTICIPATION

Community Outreach is a requirement of Title VI. Recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of GBM. GBM will engage the public in its planning and decision-making processes, as well as its marketing and outreach activities and includes the Green Bay Chamber of Commerce Diversity Committee, the Green Bay Area Hispanic Community Council, and the Green Bay Area Hmong Community Center for input.

CUSTOMER COMPLAINT PROCESS

Citizens may contact GBM to lodge a complaint or comment. All complaints/comments are tracked, followed-up and a response is made to the citizen. This process can be initiated by calling GBM at (920) 448-3450, or by visiting the Metro Center located at 901 University Avenue, Green Bay, WI 54302.